

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GEOTAG INC.,

Plaintiff,

v.

**FRONTIER COMMUNICATIONS
CORPORATION, *et al.*,**

Defendant,

2:10-cv-00265

GEOTAG INC.,

Plaintiff,

v.

YELLOWPAGES.COM, LLC, *et al.*,

Defendants,

2:10-cv-00272

GEOTAG INC.,

Plaintiff,

v.

GEORGIO ARMANI S.P.A.; *et al.*,

Defendants,

2:10-cv-00569

GEOTAG INC.,

Plaintiff,

v.

AROMATIQUE, INC.; *et al.*,

Defendants

2:10-cv-00570

GEOTAG INC., Plaintiff, v. GUCCI AMERICA, INC.; <i>et al.</i>, Defendants,	2:10-cv-00571
GEOTAG INC., Plaintiff, v. STARBUCKS CORP.; <i>et al.</i>, Defendants	2:10-cv-00572
GEOTAG INC., Plaintiff, v. RENT-A-CENTER, INC.; <i>et al.</i>, Defendants	2:10-cv-00573
GEOTAG INC., Plaintiff, v. THE WESTERN UNION COMPANY; <i>et al.</i>, Defendants	2:10-cv-00574

GEOTAG INC.,

Plaintiff.

v.

ROYAL PURPLE, INC.; *et al.*,

Defendants

2:10-cv-00575

GEOTAG, INC.,

Plaintiff,

v.

YAKIRA, L.L.C.; *et al.*,

Defendants

2:10-cv-00587

GEOTAG INC.,

Plaintiff,

v.

WHERE 2 GET IT, INC.; *et al.*,

Defendants

2:11-cv-00175

GEOTAG INC.,

Plaintiff,

v.

ZOOSK, INC.

Defendant.

2:11-cv-00403

GEOTAG INC., Plaintiff, v. EYE CARE CENTERS OF AMERICA, INC. Defendant.	2:11-cv-00404
GEOTAG INC., Plaintiff, v. AMERCO, <i>et al.</i> Defendants	2:11-cv-00421
GEOTAG INC., Plaintiff, v. 7-ELEVEN, INC., <i>et al.</i>, Defendants	2:11-cv-00424
GEOTAG INC., Plaintiff, v. SUNBELT RENTALS, INC. Defendant.	2:11-cv-00425

GEOTAG INC., Plaintiff, v. CLASSIFIED VENTURES, LLC. Defendant.	2:11-cv-00426
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GEOTAG INC., Plaintiff, v. CANON INC. and, CANON U.S.A., INC., Defendants,	2:12-cv-00043
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GEOTAG INC., Plaintiff, v. AMERICAN APPAREL INC., Defendant,	2:12-cv-00436
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GEOTAG INC., Plaintiff, v. ABERCROMBIE & FITCH CO., Defendant,	2:12-cv-00437
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GEOTAG INC.,

Plaintiff,

v.

AMERICAN EAGLE OUTFITTERS INC.,

Defendant,

2:12-cv-00438

GEOTAG INC.,

Plaintiff,

v.

ANN INC.,

Defendant,

2:12-cv-00439

GEOTAG INC.,

Plaintiff,

v.

BURLEIGH POINT LTD.,

Defendant,

2:12-cv-00441

GEOTAG INC.,

Plaintiff,

v.

CATALOGUE VENTURES, INC.,

Defendant,

2:12-cv-00442

GEOTAG INC., Plaintiff, v. BURBERRY LIMITED, Defendant,	2:12-cv-00443
GEOTAG INC., Plaintiff, v. BURLINGTON FACTORY WAREHOUSE CORPORATION, Defendant,	2:12-cv-00444
GEOTAG INC., Plaintiff, v. CACHE INC., Defendant,	2:12-cv-00445
GEOTAG INC., Plaintiff, v. THE WILLIAM CARTER COMPANY, Defendant,	2:12-cv-00446

GEOTAG INC.,

Plaintiff,

v.

CHARMING SHOPPES INC.,

Defendant,

2:12-cv-00447

GEOTAG INC.,

Plaintiff,

v.

CHICO'S FAS INC.,

Defendant,

2:12-cv-00448

GEOTAG INC.,

Plaintiff,

v.

CITI TRENDS INC.,

Defendant,

2:12-cv-00449

GEOTAG INC.,

Plaintiff,

v.

CLAIRE'S BOUTIQUES, INC.,

Defendant,

2:12-cv-00450

GEOTAG INC.,

Plaintiff,

v.

COLDWATER CREEK INC.,

Defendant,

2:12-cv-00451

GEOTAG INC.,

Plaintiff,

v.

DAVID'S BRIDAL INC.,

Defendant,

2:12-cv-00452

GEOTAG INC.,

Plaintiff,

v.

DEB SHOPS INC.,

Defendant,

2:12-cv-00453

GEOTAG INC.,

Plaintiff,

v.

DELIAS INC.,

Defendant,

2:12-cv-00454

GEOTAG INC., Plaintiff, v. DESTINATION MATERNITY CORPORATION, Defendant,	2:12-cv-00455
GEOTAG INC., Plaintiff, v. DIESEL U.S.A. INC., Defendant,	2:12-cv-00456
GEOTAG INC., Plaintiff, v. DONNA KARAN INTERNATIONAL INC., Defendant,	2:12-cv-00457
GEOTAG INC., Plaintiff, v. LVMH MOET HENNESSY LOUIS VUITTON INC., Defendant,	2:12-cv-00458

GEOTAG INC.,

Plaintiff,

v.

DOTS, LLC,

Defendant,

2:12-cv-00459

GEOTAG INC.,

Plaintiff,

v.

DRAPER’S & DAMON’S INC.,

Defendant,

2:12-cv-00460

GEOTAG INC.,

Plaintiff,

v.

EDDIE BAUER LLC,

Defendant,

2:12-cv-00461

GEOTAG INC.,

Plaintiff,

v.

ESPRIT US RETAIL LIMITED,

Defendant,

2:12-cv-00462

GEOTAG INC.,

Plaintiff,

v.

FACTORY CONNECTION LLC,

Defendant,

2:12-cv-00463

GEOTAG INC.,

Plaintiff,

v.

THE FINISH LINE INC.,

Defendant,

2:12-cv-00464

GEOTAG INC.,

Plaintiff,

v.

FOREVER 21 RETAIL INC.,

Defendant,

2:12-cv-00465

GEOTAG INC.,

Plaintiff,

v.

FORMAL SPECIALISTS LTD.,

Defendant,

2:12-cv-00466

GEOTAG INC., Plaintiff, v. FREDERICK'S OF HOLLYWOOD STORES INC., Defendant,	2:12-cv-00467
GEOTAG INC., Plaintiff, v. GROUPE DYNAMITE, INC. D/B/A GARAGE, Defendant,	2:12-cv-00468
GEOTAG INC., Plaintiff, v. GUESS? RETAIL INC., Defendant,	2:12-cv-00469
GEOTAG INC., Plaintiff, v. H&M HENNES & MAURITZ LP, Defendant,	2:12-cv-00470

GEOTAG INC.,

Plaintiff,

v.

HANESBRANDS INC.,

Defendant,

2:12-cv-00471

GEOTAG INC.,

Plaintiff,

v.

HOT TOPIC INC.,

Defendant,

2:12-cv-00472

GEOTAG INC.,

Plaintiff,

v.

HUGO BOSS FASHION INC.,

Defendant,

2:12-cv-00473

GEOTAG INC.,

Plaintiff,

v.

J. CREW GROUP INC.,

Defendant,

2:12-cv-00474

GEOTAG INC.,

Plaintiff,

v.

JIMMY JAZZ INC.,

Defendant,

2:12-cv-00475

GEOTAG INC.,

Plaintiff,

v.

JOS. A. BANK CLOTHIERS INC.,

Defendant,

2:12-cv-00476

GEOTAG INC.,

Plaintiff,

v.

ALCO STORES INC.

Defendant,

2:12-cv-00477

GEOTAG INC.,

Plaintiff,

v.

FRED'S INC.,

Defendant,

2:12-cv-00478

GEOTAG INC.,

Plaintiff,

v.

BAKERS FOOTWEAR GROUP,

Defendant,

2:12-cv-00479

GEOTAG INC.,

Plaintiff,

v.

BROWN SHOE COMPANY INC.,

Defendant,

2:12-cv-00480

GEOTAG INC.,

Plaintiff,

v.

COLLECTIVE BRANDS INC.,

Defendant,

2:12-cv-00481

GEOTAG INC.,

Plaintiff,

v.

CROCS INC.,

Defendant,

2:12-cv-00482

GEOTAG INC.,

Plaintiff,

v.

DSW INC. D/B/A DSW SHOE INC.,

Defendant,

2:12-cv-00483

GEOTAG INC.,

Plaintiff,

v.

FLEET FEET INC.,

Defendant,

2:12-cv-00484

GEOTAG INC.,

Plaintiff,

v.

GENESCO INC.,

Defendant,

2:12-cv-00486

GEOTAG INC.,

Plaintiff,

v.

HEELY'S INC,

Defendant,

2:12-cv-00487

GEOTAG INC.,

Plaintiff,

v.

JUSTIN BOOT COMPANY,

Defendant,

2:12-cv-00488

GEOTAG INC.,

Plaintiff,

v.

AMERICAN GREETINGS CORPORATION,

Defendant,

2:12-cv-00520

GEOTAG INC.,

Plaintiff,

v.

HALLMARK CARDS, INC.,

Defendant,

2:12-cv-00521

GEOTAG INC.,

Plaintiff,

v.

HICKORY FARMS INC.,

Defendant,

2:12-cv-00522

GEOTAG INC.,

Plaintiff,

v.

SPENCER GIFTS LLC,

Defendant,

2:12-cv-00523

GEOTAG INC.,

Plaintiff,

v.

INTERNATIONAL COFFE & TEA, LLC,

Defendant,

2:12-cv-00524

GEOTAG INC.,

Plaintiff,

v.

THINGS REMEMBERED, INC.,

Defendant,

2:12-cv-00525

GEOTAG INC.,

Plaintiff,

v.

THE YANKEE CANDLE COMPANY,

Defendant,

2:12-cv-00526

GEOTAG INC.,

Plaintiff,

v.

BOSE CORPORATION,

Defendant,

2:12-cv-00527

GEOTAG INC.,

Plaintiff,

v.

GUITAR CENTER INC.,

Defendant,

2:12-cv-00528

GEOTAG INC.,

Plaintiff,

v.

PROGRESSIVE CONCEPTS INC.,

Defendant,

2:12-cv-00529

GEOTAG INC.,

Plaintiff,

v.

24 HOUR FITNESS WORLDWIDE INC.,

Defendant,

2:12-cv-00530

GEOTAG INC.,

Plaintiff,

v.

BALLY TOTAL FITNESS CORPORATION,

Defendant,

2:12-cv-00531

GEOTAG INC.,

Plaintiff,

v.

BARE ESCENTUALS INC.,

Defendant,

2:12-cv-00532

GEOTAG INC.,

Plaintiff,

v.

BIOSCRIP INC.,

Defendant,

2:12-cv-00533

GEOTAG INC.,

Plaintiff,

v.

CRABTREE & EVELYN,

Defendant,

2:12-cv-00534

GEOTAG INC.,

Plaintiff,

v.

CURVES INTERNATIONAL INC.,

Defendant,

2:12-cv-00535

GEOTAG INC.,

Plaintiff,

v.

GOLD'S GYM INTERNATIONAL INC.,

Defendant,

2:12-cv-00536

GEOTAG INC.,

Plaintiff,

v.

GREAT CLIPS INC.,

Defendant,

2:12-cv-00537

GEOTAG INC.,

Plaintiff,

v.

L.A. FITNESS INTERNATIONAL LLC,

Defendant,

2:12-cv-00538

GEOTAG INC., Plaintiff, v. LIFE TIME FITNESS INC., Defendant,	2:12-cv-00539
GEOTAG INC., Plaintiff, v. M.A.C. COSMETICS INC., Defendant,	2:12-cv-00540
GEOTAG INC., Plaintiff, v. MERLE NORMAN COSMETICS, Defendant,	2:12-cv-00541
GEOTAG INC., Plaintiff, v. VITAMIN COTTAGE NATURAL FOOD MARKETS, INC., Defendant,	2:12-cv-00542

GEOTAG INC.,

Plaintiff,

v.

REGIS CORPORATION,

Defendant,

2:12-cv-00543

GEOTAG INC.,

Plaintiff,

v.

SALLY BEAUTY SUPPLY LLC,

Defendant,

2:12-cv-00544

GEOTAG INC.,

Plaintiff,

v.

SEPHORA USA INC.,

Defendant,

2:12-cv-00545

GEOTAG INC.,

Plaintiff,

v.

TONI & GUY USA, LLC,

Defendant,

2:12-cv-00546

GEOTAG INC., Plaintiff, v. ULTA SALON, COSMETICS & FRAGRANCE INC., Defendant,	2:12-cv-00547
GEOTAG INC., Plaintiff, v. VITAMIN SHOPPE INDUSTRIES, INC., Defendant,	2:12-cv-00548
GEOTAG INC., Plaintiff, v. EYEMART EXPRESS, LTD., Defendant,	2:12-cv-00549
GEOTAG INC., Plaintiff, v. LUXOTTICA RETAIL MORTH AMERICA INC., Defendant,	2:12-cv-00550

GEOTAG INC.,

Plaintiff,

v.

NATIONAL VISION INC.,

Defendant,

2:12-cv-00551

GEOTAG INC.,

Plaintiff,

v.

U.S. VISION INC.,

Defendant,

2:12-cv-00552

GEOTAG INC.,

Plaintiff,

v.

WILD BIRDS UNLIMITED INC.,

Defendant,

2:12-cv-00553

GEOTAG INC.,

Plaintiff,

v.

JOS. A. BANK CLOTHIERS INC.,

Defendant,

2:12-cv-00554

GEOTAG INC.,

Plaintiff,

v.

BUTH-NA-BODHAIGE INC.,

Defendant,

2:12-cv-00555

GEOTAG INC.,

Plaintiff,

v.

PSP GROUP, LLC,

Defendant,

2:12-cv-00556

GEOTAG INC.,

Plaintiff,

v.

RITZ INTERACTIVE LLC,

Defendant,

2:12-cv-00557

WHERE 2 GET IT, INC.; *et al.*,

Plaintiff,

v.

GEOTAG INC.,

Defendant.

2:12-cv-00149

MOTION FOR EXTENSION OF TIME TO SECURE NEW COUNSEL

Plaintiff GeoTag, Inc. ("Plaintiff") files this Motion for Extension of Time to Secure New Counsel and would respectfully show the Court the following:

Plaintiff has retained new local counsel and requests an additional 14 days to assemble its full team of lead counsel.

Plaintiff terminated its former counsel Buether Joe & Carpenter, LLC, Ni Law Firm and the Law Offices of Young Pickett on August 27, 2012. Since that time, Plaintiff has been active and diligent in its efforts to secure substitute representation. Plaintiff's representatives have personally met with five law firms and have spoken with more than ten additional law firms regarding representation in these lawsuits. Through multiple discussions with numerous lawyers, Plaintiff has discovered this litigation is too large for a single law firm to handle, therefore Plaintiff is interviewing multiple law firms to assemble a team to represent GeoTag in these lawsuits. Plaintiff has encountered difficulties coordinating the team effort due to a variety of factors, including the size, scope and complexity of the lawsuits, the number of defendants, conflicts of interest (many law firms have a conflict due to the number of defendants), staffing/availability necessary to take on such a complex representation and coordination with related litigation in the District of Delaware.

Plaintiff attaches the Declaration of John Veenstra (attached as Exhibit A) to verify its diligent efforts to secure new counsel and to support its request for additional time to assemble its full team of lead counsel.

Plaintiff has retained the law firm of Spangler & Fussell, P.C. to act as local counsel. However, Plaintiff requests an additional 14 days to assemble its full team of lead counsel. The Defendants will not be prejudiced by an extension of time to secure new lead counsel because

Plaintiff will continue to meet the deadlines set by the Court in its August 31, 2012 Amended Scheduling Order. This extension is not sought for delay, but so that justice may be done.

Dated: September 10, 2012

Respectfully submitted,

By: /s/ Andrew W. Spangler

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LOCAL COUNSEL FOR
GEOTAG, INC.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement of Local Rule CV-7(h) and that the motion is opposed and that an open issue exists for the Court to resolve.

/s/ Andrew W. Spangler
Andrew W. Spangler

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on September 10, 2012, to all counsel of record who are deemed to have consented to electronic service vi the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Andrew W. Spangler
Andrew W. Spangler